

EXHIBIT 2

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,

Plaintiff,

V.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Defendant.

CONFIDENTIAL – FILED UNDER SEAL

Case No. 1:17-mc-00151-LPS

**DECLARATION OF CARLOS VECCHIO IN SUPPORT OF THE VENEZUELA
PARTIES' MOTION TO MAINTAIN THE SPECIAL MASTER'S PROPOSED SALES
PROCEDURES ORDER AND EXPLANATORY REPORT UNDER SEAL**

I, Carlos Alfredo Vecchio, declare as follows:

1. I serve as Ambassador to the United States for the Bolivarian Republic of Venezuela (the “Republic”). I am a member of the Interim Government established by President Juan Guaidó. In 2019, the United States recognized the Guaidó government as the legitimate governing authority of the Republic. The administration of President Biden has reaffirmed that recognition. *See* U.S. Dep’t of State, “U.S. Relations with Venezuela: Bilateral Relations Fact Sheet,” (July 6, 2021) *available at* <https://www.state.gov/u-s-relations-with-venezuela> (Biden Administration recognition of Guaidó and National Assembly).

2. I submit this declaration in support of the motion by the Republic, PDVSA, PDV Holding, Inc., and CITGO Petroleum Corporation (“CITGO”) to maintain under seal certain portions of the recently filed Proposed Sales Procedures Order (D.I. 302) and the Special Master’s Report and Recommendation Regarding Proposed Sale Procedures Order (“Explanatory Report”). [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

3. CITGO is by far the most important strategic foreign asset possessed by the people of Venezuela.

4. Any step that is perceived by the people of Venezuela as a loss of control of this vital aspect of the nation's patrimony will damage the reputation and credibility of the Interim Government of President Guaidó in their eyes. To be sure, the current crisis in Venezuela is the fault of the illegitimate Maduro regime, and the Chávez regime that preceded it. In this regard, the Interim Government of President Guaidó recognizes that the actions of the prior regime with respect to Crystallex were improper and that the Republic has an obligation to compensate Crystallex. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] When this Court lifted the stay in this case in May 2020, Maduro spokesman Jorge Arreaza seized on that action to claim that the United States was conspiring with “lawmaker Juan Guaidó and his accomplices” to undertake “a fraudulent representation of the Republic and PDVSA, which is not only illegal but acts to the detriment of the national interest,” in order to illegally seize Venezuelan assets in the United States. *See* D.I. 189 at ¶ 20 (Decl. of A. R. Brewer-Carías). And Carlos Ron—the Maduro regime’s purported Vice-Minister for North America—falsely said on national television that, after the United States “gave control of Citgo to the phantom government that they recognize headed by Guaidó,” the U.S. courts decided to “give the go-ahead to begin the process of selling Citgo.” *Id.*

7. The United States Government has recognized the reality and the severity of these threats to the Interim Government. The State Department has specifically so stated: “[T]he United States assesses that the domestic legitimacy of the interim government under Guaidó would be severely eroded were a forced sale of CITGO to take place while the illegitimate Maduro regime still attempts to cling to de facto power in Caracas.” D.I. 212-1 at 4. As the State Department asserted in July 2020, taking steps toward a public sale of PDVH shares would cause “the Venezuelan people [to] seriously question the interim government’s ability to protect the nation’s assets, thereby weakening it and U.S. policy in Venezuela today.” D.I. 212-1 at 4.

8. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]


[REDACTED]

[REDACTED]

[REDACTED]

I declare under penalty of perjury under the law of the United States of America that the foregoing is true and correct.

Executed on August 20, 2021.



Carlos Alfredo Vecchio